

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHANIE JONES, JONESWORKS LLC,

Plaintiffs,

v.

JENNIFER ABEL, MELISSA NATHAN,  
JUSTIN BALDONI, WAYFARER STUDIOS  
LLC, and JOHN DOES 1-10,

Defendants.

Civ. Action No. 1:25-cv-00779-LJL  
rel. 1:24-cv-10049-LJL

**DECLARATION OF ELLYN S. GAROFALO IN SUPPORT OF  
JENNIFER ABEL’S LETTER MOTION TO COMPEL COMPLIANCE WITH  
DOCUMENT SUBPOENA SERVED ON NON-PARTY VANZAN, INC.**

I, Ellyn S. Garofalo, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm Liner Freedman Taitelman + Cooley, LLP, attorneys of record for Defendant and Counterclaimant Jennifer Abel (“Ms. Abel”) in the above-captioned matter.

2. I submit this declaration in support of Ms. Abel’s letter motion to compel compliance with a document subpoena served on non-party Vanzan, Inc. on April 21, 2025 (the “Vanzan Subpoena”). A true and correct copy of the Vanzan Subpoena is attached and incorporated as Exhibit A hereto.

3. A true and correct copy of the Complaint filed in *Vanzan v. Does 1-10*, Index No. 655130/2024, September 27, 2024 (the “*Vanzan Action*”) is attached and incorporated as Exhibit B hereto.

4. A true and correct copy of the December 19, 2024 Notice of Discontinuance filed in the *Vanzan Action* is attached and incorporated as Exhibit C hereto.

5. Apart from the Complaint and Notice of Discontinuance, there are no entries on the docket in the *Vanzan* Action and a judge was neither requested nor assigned before the *Vanzan* Action was discontinued. Attached hereto as Exhibit D is a true and correct copy of the docket sheet in the *Vanzan* Action as of June 24, 2025.

6. A true and correct copy of an April 21, 2025 Deadline article in which Blake Lively's counsel from the law firms Manatt, Phelps & Phillips, LLP and Willkie Farr & Gallagher LLP acknowledge and defend the *Vanzan* Action and Subpoena is attached and incorporated as Exhibit E hereto.

7. My office participated in a series of meet and confer conferences with Vanzan's counsel from the law firm Zuckerman Spaeder LLP via email and Zoom. During these conferrals, Ms. Abel agreed to withdraw Request Nos. 2-3 and 5-8 and narrow the scope of many of the remaining requests. Specifically, Ms. Abel agreed to: (i) narrow Request No. 4 to seek only the identities of Vanzan's shareholders; (ii) narrow Request No. 9 to seek only communications between Vanzan and/or its counsel and Stephanie Jones and Jonesworks LLC and/or their counsel; (iii) narrow Request No. 10 to seek only the subpoena served by Vanzan on Jonesworks LLC and/or Stephanie Jones; and (iv) narrow Request No. 11 to seek only documents produced pursuant to such subpoena(s).

8. Notwithstanding the proposed compromise, as of the date of this filing, Vanzan has not produced a single document responsive to Ms. Abel's requests.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Los Angeles, CA  
June 24, 2025

By: /s/ Ellyn S. Garofalo  
Ellyn S. Garofalo

**CERTIFICATE OF SERVICE**

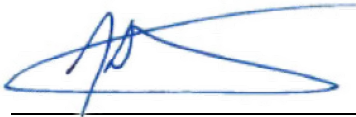
I, Rose Khatchikian, do hereby certify that I am not less than 18 years of age and that on this 24th day of June, 2025 I caused a copy of the within **Declaration of Ellyn S. Garofalo in Support of Jennifer Abel's Letter Motion to Compel Compliance With Document Subpoena Served on Non-Party Vanzan, Inc.** to be served upon the following counsel for the parties via email:

**Jon R. Fetterolf**  
**ZUCKERMAN SPAEDER LLP**  
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I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: June 24, 2025  
Los Angeles, CA

  
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Rose Khatchikian